

I am the Vice President/CFO of Omni Broadcasting Company, the parent company of a group of 16 radio stations located in Central and Northern Minnesota. I also have an integral role in the operations of four of those stations located in Bemidji, Minnesota (Paul Bunyan Broadcasting Co.). Those stations are KBUN-AM, KBHP-FM, KKZY-FM and KLLZ-FM.

I am responding to some of your proposed rules changes that will affect how radio broadcasters will be able to serve their local communities:

Local Public Service

We take our responsibility to our community seriously in this regard, as do the majority of broadcasters in our country. Currently we've been giving on-air support to Bemidji State University, promoting two scholarship drives (academic and athletic); The Bemidji Jaycees Home, Sport and Travel Show, and the Beltrami County (American Cancer) Relay for Life Restaurant Coupon Book. Not only did we contribute money towards the printing of the coupon book, but we are selling the book in our lobby and this past weekend at the Jaycees spring home show just mentioned. We also are co-sponsors of the MS Society's Walk in Bemidji, and are airing spots recorded by several members of local families whose lives have been impacted by this disease. We are promoting our MS Team, and inviting listeners to join us on the day of the event. We just concluded promoting and attending a fundraiser organized by the local Department of Natural Resources, and we gave away tickets on the air to a local Boy Scout Pancake Breakfast.

Our News/Public Service Director recently spent considerable time creating and recording a public service campaign designed to focus attention on April as Child Abuse Prevention Month that airs during the entire month. All of this is in addition to the hundreds of local 30 second public service announcements that we air each and every month on all of our radio stations.

We also broadcast a weekday, 15-20 minute primetime public service show after the noon news block. "Chat-About" has been on the air since the 1950's and is a well-known program in the area. In a typical year 150-200 organizations are given time on this program. Guests represent every facet of life in this area, from education, health, city, county and state government, independent businesses, and the non-profit sector. Issues covered on the program encompass life as we know it in Northern Minnesota. Certainly, any issue of current or future importance to the community is addressed during "Chat-About".

On those rare days when there is no regularly scheduled guest(s), or if there is a last minute cancellation, the phone lines are opened for callers to speak on whatever topic they wish. We also have conversations with elected officials from our state capital during each week of our legislative session. Listeners call in with their questions as well. A tremendous amount of public education and information is disseminated on this community favorite program.

I believe local broadcasters are in tune with their community's needs and know how to serve them. Because local broadcasters are a part of their community, they understand what the significant needs and issues face them and are important. Establishing local "advisory boards" would be yet another waste of valuable time and cost money to implement. Holding ascertainment meetings (which I did many, many years ago) would also be not only a waste of staff time, but it would be an intrusion on our busy community leaders who are already busy handling normal day to day business and coping with daily stresses of life.

We do air responsive issue-oriented programming each and every week of each and every month, all year long. In fact, our company has received seven "Crystal" awards from the National Association of Broadcasters for providing exemplary public service. In addition, the National Association of Broadcasters Education Foundation, awarded Omni Broadcasting the "Radio Partnership Award" twice for our annual "Radiothon to End Abuse". This Radiothon has raised over two million dollars since 1989. Prevent Child Abuse Minnesota is our state partner working along with 13 local Minnesota county child abuse prevention councils or agencies that are dedicated to ending child abuse and neglect. In addition to national recognition, we also have received awards for programming and public service efforts from the Minnesota Association of Broadcasters.

Radio stations throughout America devote countless hours of broadcast time worth millions of dollars each year to needy local organizations. Communities are strengthened by this support each and every day.

News content

Our News Director has over 30 years experience in the Bemidji market. He can't walk down the street without someone stopping him to ask him about a news story they heard, or if he knows about this project or that proposal, or this piece of legislation. He is an integral part of his community. We DO provide quality local news, every hour from 6:00AM to 5:00PM, weekdays. This is in addition to regional and national news.

Local sports

We believe the local community is interested in hearing how their favorite high school teams are doing, so we carry both girls and boys high school sports in the Bemidji area. Our sports team provides play by play coverage of both home and away games in football, baseball, and boys and girls basketball and hockey. In the summer, we also have live coverage of a golf tournament that has been a part of local history for over 40 years, "The Birchmont Classic." Coverage of local high school and college games can be heard on radio stations across America.

Weather coverage:

There is a concern that because radio stations do not maintain staffing 24 hours a day, that they cannot be responsive and immediate in the event of changing and threatening weather. We know our company is not the only one that has an emergency plan set up in the event we don't have an announcer on duty. We can either extend an existing air shift if something develops, or have an announcer here within a very short period of time. We know how critical it is to keep our listeners informed if conditions become threatening. We are so concerned, in fact, that the National Weather Service at any time of the day or night, can interrupt our programming with immediate news of an impending storm, tornado, etc. This is in addition to our announcers having access in their control rooms to LOCAL color weather radar so they remain as knowledgeable as possible. We also contract with well-known professional meteorologists who give their reports and updates throughout the day.

Remote station operation

The technical advances our industry has experienced, has made it possible for stations to maintain stable station monitoring and transmission at unattended operations and with remote station controls. Since deregulation allowed for hundreds of station signals to be added to the spectrum, remote station operations is the only practical way to keep stations on the air. When the number of signals in a market increase it doesn't equate to revenues increasing. It is indeed more and more challenging operating additional stations on the same budget. Without remote station operation and unattended hours of broadcast, broadcasters will not be able to maintain the quality of programming they offer and worse yet, stations will be turned off. Is this the future of local radio? I hope not.

Your consideration is appreciated in these matters.

Mary Campbell

Vice President/CFO

Paul Bunyan Broadcasting Co.

Bemidji, MN